

FILED

JUN 15 2023

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT, W.D. Pa, Pgh.

HORTON, etal v. RANGOS, etal | No: 2:22-CV-1391-NRINTERVENOR PHILLIP REHWALD'S MOTION TO EXTEND DEADLINE
TO ANSWER OR RESPOND TO THE DEFENDANTS BRIEFS DUE 6-2-2023

Intervenor PHILLIP REHWALD hereby moves to extend the deadline to answer or otherwise respond to Defendant(s) Brief(s) Due 6-2-2023:

1. On June 2, 2023, Defendants filed a Supplemental Brief in opposition to Preliminary Injunction.
2. Intervenor PHILLIP REHWALD petitions this Honorable Court explicitly rule that J. RANGOS remains unprotected by immunity, pursuant to Rhodes, US [sic] inter alia.
3. Intervenor additionally petitions this Honorable Court both significantly widen the claims and defendants involved herein, to additionally Joinder Allegheny County Public Defenders Office + chief Matthew Dugan et al * as responsible culpable actor(s), "in concert" with Rangos + Scherer, pursuant to Bradley, S.C.O.P.A. 2021 (holding "I.A.C(s) "even on appeal") including this instant Federal Appeal, (upheld by Federal "Erie Doctrine") - eliminating occasion for unmerited interlocutory appeal and the unnecessary stay of proceedings at further expense to taxpayers, as well as an appropriate, and imprudent strain on judicial resources.
4. Intervenor respectfully reiterates prior pleading to Joinder as Co Plaintiff.

(*)
UNDER-funded

See:

Adam Kuren

+

Aven Allabaugh

vs.

Luzerne County, Pa

✓ S.C.O.P.A.

5. Intervenor has conferred with at least two (2) counsellors for Defendants, of which neither have opposed Intervenor's "Writ For Extraordinary Relief" at No. 30 WM 2023 S.C.O.P.A. - V.D. wherein Intervenor's "identical" "Non Curable" [declared] "Absolute Nullity" "Dead-head" (caput mortuum) claim of no-not-one Gagnon Prelim Hearing (US CONST 14TH AMENDT DUE PROCESS VIOLATION) meritorious claim fully supported by Record-Based-Evidence as replete and overripe; and that, with an additional counsel for the Defendants, who has properly identified Phillip Rehwald as "Intervenor" and proposed Plaintiffs.

6. Upon information and belief, granting an extension will neither substantially nor unreasonably delay this case, and given the above, may actually expedite it and conserve resources for all parties and this Honorable Court.

7. Intervenor submits the foregoing circumstances constitute good cause to extend the deadline to answer until 14 days after this Honorable Court's adjudication of Intervenor's motions. Accord F.R.C.P. 6(b).

WHEREFORE, Intervenor respectfully requests this Honorable Court enter the attached order extending the deadline to respond to 14 days after its adjudication of Intervenor's aforesaid motions.

DATED: June 10, 2023

Respectfully Submitted,
X Phillip Rehwald
Phillip Rehwald, Prose
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175 Progress Drive
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IN THE UNITED STATES DISTRICT COURT, W.D. Pa, Pgh.

HORTON, et al v. RANGAS et al / No 2:22-CV-1391-NR

[PROPOSED] ORDER GRANTING INTERVENOR PHILLIP REHWALD'S
MOTION TO EXTEND DEADLINE TO ANSWER OR RESPOND
TO DEFENDANTS BRIEFS DUE 6-2-2023

- A. AND NOW, Intervenor's Motion to Extend Deadline to Answer or Respond to Defendants' Briefs Due 6-2-2023 is GRANTED. Intervenor may answer or otherwise respond to Defendants' Briefs within 14 days of this Court's entry of an order granting his pending motions; and
- B. Intervenor's Motion to Joinder Allegheny County Public Defender's Office and chief Matthew Dugan et al as Co-Defendants is GRANTED; and
- C. Intervenor's Motion (2nd) to Joinder himself as Co-Plaintiff is GRANTED.

DATED this _____ day of _____, 202__.

BY THE COURT,

United States District Judge

PROOF OF SERVICE

I, PHILLIP REHWALD, do hereby certify that I have served a true and correct copy of the foregoing Petition / Motion / Brief, to the parties and in the manner listed below. This service satisfies the requirements of the Pa.R.Crim.P. Rules 576 and 577. This service also satisfies the requirements of the Prisoner's Mailbox Act, "*Commonwealth v. Jones*, 700 A.2d 423 (Pa. 1997); and *Houston v. Lack*, 486 US 266 (1988).

Service by First Class Mail:

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Date: 6-16-23

⑧ Phillip Rehwald
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